

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	
)	JUDGE DAN AARON POLSTER
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC,)	
<i>et al.</i>)	
)	
Defendants.)	

**DECLARATION OF KENDRICK HARRISON IN SUPPORT OF MOTION FOR
EXPEDITED DISCOVERY OF STUDENT LOAN STIPEND DIVERSION SCHEME**

I, Kendrick Harrison, pursuant to 28 U.S.C. § 1746, hereby declare:

1. I have filed a motion to intervene in the above-captioned case.
2. I have retained the National Student Legal Defense Network to represent me in seeking discovery of the diversion of my student loan stipends.
3. I am a veteran of the Iraq War, and I am disabled as a result of my service.
4. I am married, with six children, all under the age of 18.
5. I have been enrolled in a business degree program at Argosy University-Online since 2016 until it closed in March 2019. Before the school closed, I expected to graduate in September 2019. I was a full-time student at the school. I pursued my business degree in order to provide a better life for my family.

6. I am trying to transfer to another school to finish my degree. Based on my efforts so far, it seems unlikely that I will be able to transfer all of my credits.

7. In order to pay for my education and my living expenses while I was attending school, I borrowed money from the federal government.

8. My financial aid agreement with the federal government provides for loans in excess of what is required to pay my tuition balance and is intended to be disbursed to me as a stipend, to pay for living expenses while I attend school full-time. I should have received a stipend in the amount \$6000.00 for the semester beginning January 2019. My stipend has not been disbursed.

9. On February 14, 2019, I wrote to the Receiver to request a release of my stipend funds. I informed the Receiver that my landlord and creditors were threatening legal action as a result of this situation. Exh. 1.

10. The Receiver responded that same day that “the funds were simply not there,” but “we are working on it around the clock and are hoping to have it solved as quick as humanly possible.” Exh. 2.

11. The Receiver has explained in court that Argosy or its parent DCEH drew down money from the Department of Education, by certifying that my stipend and the stipends of other Argosy students had been paid, when they, in fact, had not been. The Receiver has not disclosed where or to whom that money went.

12. Until Sunday, March 24, my family lived in a 4 bed room 3 bath room home in Las Vegas, Nevada. As a result of not receiving my stipend, I was not able to pay rent for my apartment, and the landlord placed us in eviction proceedings. We were required to vacate the apartment on March 24. Presently, my family is living in an extended-stay motel.

13. The delinquencies on our rent payments has damaged our credit rating. As a result, we have had difficulty renting another apartment or home. If we cannot find another place to live soon, we will have to place our children with different family members. This will disrupt their educations and separate them from us and each other.

14. I am incurring substantial credit card debt to pay life expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 4, 2019

Kendrick Harrison
KENDRICK HARRISON

EXHIBIT 1

Subject: Fwd: Argosy University setting students up for failure !!!
Date: Friday, March 29, 2019 at 9:35:49 AM Eastern Daylight Time
From: Kendrick harrison
To: Eric Rothschild

----- Forwarded message -----

From: Kendrick harrison <harrisonkj34@gmail.com>
Date: Thu, Feb 14, 2019, 12:11 PM
Subject: Argosy University setting students up for failure !!!
To: <info@dottoreco.com>, <5newsdesk@fox5vegas.com>

Hello

I am writing this e-mail to inform you that for several weeks argosy university has been in violation of their Financial Aid Stipend Return Policy, as well as the terms that the university and I agreed upon. The policy states: *All student Title IV (federal) financial aid credit balances, if one is created for the payment period in question, will be issued as a stipend to the student no later than fourteen (14) calendar days:*

I haven't gotten a stipend since December and I have been humbly requesting a release of my funds to no avail. We are going in to march and Argosy has thousands of dollars that are owed to me. My family and I financially crippled by the "Government Shutdown" can't hold out much longer. My landlord and creditors are threatening legal action as a direct result of this situation. I believe it to be a disservice for students to have to worry more about their finances than earning their degree. As a student this has caused me a great deal of anxiety and undue stress. This situation has severely impacted my course work and ability to produce quality and meaningful assignments. In furtherance I am requesting additional time and leniency from my instructors so that I may salvage my grades. Unfortunately, I feel I am being left no options but to escalate this matter.

Thank You,

Kendrick Harrison

(725)502-0016

EXHIBIT 2

Tuesday, April 2, 2019 at 5:34:28 PM Eastern Daylight Time

Subject: Fwd: Dream Center Receivership
Date: Thursday, March 28, 2019 at 7:24:37 PM Eastern Daylight Time
From: Kendrick harrison
To: Eric Rothschild
Attachments: image003.png, image003.png

----- Forwarded message -----

From: Krista Kotalik <krista@dottoreco.com>
Date: Thu, Feb 14, 2019, 4:48 PM
Subject: Dream Center Receivership
To: harrisonkj34@gmail.com <harrisonkj34@gmail.com>

Hi Kendrick,

Thank you for your email regarding the receivership. I certainly understand your frustration and how horrible this situation has been for you and your family and I want to assure you that we are doing everything in our power to right the wrongs that have been happening and move forward in a positive direction. I wish that I could escalate your funds for you and I'm so sorry but when we were appointed in the Federal Court in this case, the funds were simply not there. I wish I had a better answer for you but right now we are working around the clock to recover the funds and/or a way to generate new funds so that we can get these stipends paid as soon as humanly possible. If you would like to read more about the issue, there is a Receiver Order and a letter that we sent to the Department of Education regarding the funds on our website at www.dottoreco.com.

As soon as we have the money I will be sending out an email to let everyone know that we have and it and when it will be distributed. Unfortunately right now we don't have a timeline as we are dependent on other people, but I assure you that we are working on it around the clock and are hoping to have it solved as quick as humanly possible. Again, I will update you as soon as that happens.

Krista Kotalik



2344 Canal Road

Cleveland, Ohio 44113

216-771-0727